



**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**Enterprise Gas Processing LLC
Toca Gas Processing Plant
St Bernard, St Bernard Parish, Louisiana
Agency Interest Number 17691
Activity Number PER20080001
Proposed Permit Number 2500-00013-V6**

I APPLICANT

Company

Toca Gas Processing Plant
PO Box 4324
Houston, Texas 77210-0189

Facility

Enterprise Gas Processing LLC
2300 Bayou Rd
St Bernard, St Bernard Parish, Louisiana
Approximate UTM coordinates are 226 228 kilometer East and 3306 968 kilometer North, Zone 16

II FACILITY AND CURRENT PERMIT STATUS

Toca Gas Processing Plant is an oil and gas production facility began operation in 1998. It is currently operating under Permit No. 2500-00013-V5, issued January 18, 2008.
The facility submitted timely renewal application.

III PROPOSED PROJECT/PERMIT INFORMATION

Proposed Permit

Permit application and Emission Inventory Questionnaire were submitted by Enterprise Gas Processing, LLC on April 24, 2008, requesting a Part 70 operating permit renewal.

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Permitted Air Emissions

Estimated emissions in tons per year are as follows

| Pollutant | Before | After | Change |
|------------------|--------|--------|--------|
| PM ₁₀ | 46 24 | 46 24 | - |
| SO ₂ | 8 91 | 8 91 | - |
| NO _x | 772 66 | 772 66 | - |
| CO | 55 18 | 55 18 | - |
| VOC | 122 09 | 122 09 | - |

IV REGULATORY ANALYSIS

The permit reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulation New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Prevention of Significant Deterioration (PSD) do not apply

Louisiana Air Quality Regulations and NSPS

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or Table 2 of the Air Permit Briefing Sheet. Similarly, the monitoring, Reporting, and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions, and standards are provided in the Facility Specific Requirements Section of the draft permit, or explained in Table of the Air Permit Briefing Sheet.

Prevention of Significant Deterioration/Nonattainment Review

This permit is a renewal which will include updating LAC 33 III Chapter 51 (Air Toxics), LAC 33 III Chapter 15 (Emission Standards for Sulfur Dioxide), and adding the nonapplicability of 40 CFR 60 Subpart IIII, 40 CFR 60 Subpart JJJJ, and 40 CFR 63 Subpart ZZZZ (Engine Regulations) to the permit. Therefore, PSD and Non-attainment New Source Review do not apply.

MACT Requirements

N/A

Air Quality Analysis

N/A

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General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33 III 501 B 5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V PERMIT SHIELD

N/A

VI PERIODIC MONITORING

N/A

VII GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33 III Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

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Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen

Organic Compound – Any compound of carbon and another element Examples Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33 III 507 Major sources include, but are not limited to, sources which have the potential to emit ≥ 10 tons per year of any toxic air pollutant, ≥ 25 tons of total toxic air pollutants, and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes)

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50 PSD requirements are designed to ensure that the air quality in attainment areas will not degrade

Sulfur Dioxide (SO₂) – An oxide of sulfur

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid It is a regulated toxic air pollutant under LAC 33 III Chapter 51

Title V Permit – See Part 70 Operating Permit

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions, that is, any organic compound other than those, which the administrator of the U S Environmental Protection Agency designates as having negligible photochemical reactivity